

FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

BILL OF INFORMATION FOR COMPUTER FRAUD

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
JODIE T. HOANG	*	VIOLATION: 18 U.S.C. § 1030(a)(4) 18 U.S.C. § 2

* * *

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

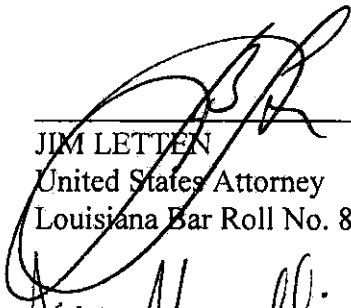
1. The defendant, **JODIE T. HOANG**, was an accounting clerk at Standard Mortgage Corporation, located in New Orleans, Louisiana.
2. Standard Mortgage Corporation originates and services residential loans, fifteen percent of which are located outside of the State of Louisiana.
3. Standard Mortgage Corporation had in place a computer system which contained accounting software systems used in the production and maintenance of mortgages.

4. This computer system affected interstate commerce and was therefore a protected computer, as defined in Title 18 United States Code, Section 1030.
5. Part of defendant, **JODIE T. HOANG'S** duties as an accounting clerk was to process funds received by Standard Mortgage Corporation at loan closings.
6. Separate interest and escrow payments were received by Standard Mortgage Corporation at the loan closings.
7. Interest was normally coded in the general ledger as "interest income" and represented a profit for Standard Mortgage Corporation. Escrow payments established the purchaser's escrow account and were coded in the general ledger as "Collection Clearing," a balance sheet item to be paid later to the Mortgage Servicing Department.
8. Using the computer system, **HOANG** changed the deposit code for numerous interest payments made at closings from "interest income" to "Collection Clearing."
9. **HOANG** then created checks payable to herself or her credit card providers from funds she had previously coded as "Collection Clearing." These checks required two signatures. **HOANG** had these checks signed by acquiring the signature stamp used by another accounts payable clerk. The second signature on the checks was a computer generated signature of the Chief Financial Officer.

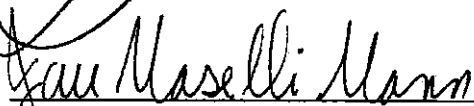
10. As the individual responsible for reconciling Standard Mortgage Corporation's general operating account, **HOANG** separated and concealed all cancelled checks received from Bank One which had been made payable to herself or on her behalf.

B. COMPUTER FRAUD:


From in or about September 2001 and continuously thereafter until in or about August 31, 2004, in the Eastern District of Louisiana and elsewhere, **JODIE T. HOANG**, defendant herein, did knowingly and with intent to defraud, access a protected computer exceeding her authorized access, and by means of such conduct furthered the intended fraud and obtained something of value, to wit: \$1,029,978.28 belonging to Standard Mortgage Corporation thereby affecting the Standard Mortgage Corporation's database, a protected computer; in violation of Title 18 United States Code, Section 1030(a)(4).



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New Orleans, Louisiana
August 12, 2009